

## Guidance from the Department of Toxic Substances Control

On October 4, 2007, the California Department of Toxic Substances Control (DTSC) reviewed to the following California Department of Public Health (CDPH) plans below and agreed with the approach we are proposing.

*CDPH will work with local government agencies (Environmental Health Departments and CUPAs) to serve as collection points for the cooler bags (lunchboxes). Individuals or CDPH partners and contractors having the product will be asked to bring them to the local government agency collection points where we will follow your recommendations below for legal disposal (transported from the local government agency with a generator ID number, under manifest, by registered haulers to authorized facilities for disposal within 90 days). CDPH is receiving the cooler bags from our employees and will follow the same protocol dealing with local government agencies in the jurisdictions where our district offices are located.*

Original correspondence/instructions from DTSC on handling of the CDPH CPNS vinyl cooler bags (lunchboxes):

*With respect to DPH's need to address the lunchbox situation as soon as possible, we agree with your general approach to use local agencies as collection points. Below we outline the steps you've already taken and some additional steps we recommend as prudent to prevent the lunchboxes from being redistributed:*

- 1. CDPH coordinates with local health agencies to collect lunchboxes returned in response to the recall notice. Local agencies serve as drop-off points for the public to return the lunchboxes pursuant to the companies recall instructions.*
- 2. Lunchboxes collected by local agencies possessing a generator ID number are transported under manifest by registered haulers to authorized facilities for disposal within 90 days. See below for more information about this.*
- 3. Local agencies that do not already have ID numbers obtain ID numbers before proceeding with Step 2. See below for more information about this.*
- 4. Lunchboxes not distributed but held in inventory by CDPH or others are managed in the same way (i.e., in accordance with steps 1, 2 and 3).*
- 5. DPH and local agencies can call 1-800-728-6942 or go to <http://www.dtsc.ca.gov/IDManifest/index.cfm> to obtain ID numbers and manifests.*
- 6. DPH and local agencies can consult [http://www.dtsc.ca.gov/HazardousWaste/index.cfm#Transporter\\_Database\\_and\\_Links](http://www.dtsc.ca.gov/HazardousWaste/index.cfm#Transporter_Database_and_Links) for a list of registered haulers.*
- 7. DPH and local agencies can consult [http://www.dtsc.ca.gov/HazardousWaste/upload/LIST\\_HWM\\_Commercial\\_Facilities.pdf](http://www.dtsc.ca.gov/HazardousWaste/upload/LIST_HWM_Commercial_Facilities.pdf) for a list of authorized facilities.*

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